

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

<b>IN RE:</b>	)	
<b>BRUCE M. MINES,</b>	)	<b>CASE NO.: 24-10910-amc</b>
	)	<b>CHAPTER 13</b>
<b>DEBTOR.</b>	)	<b>JUDGE ASHELY M. CHAN</b>
	)	
<b>U.S. BANK NATIONAL ASSOCIATION,</b>	)	
<b>NOT IN ITS INDIVIDUAL CAPACITY BUT</b>	)	
<b>SOLELY AS TRUSTEE FOR THE NRZ</b>	)	
<b>PASS-THROUGH TRUST XVIII</b>	)	
	)	
<b>CREDITOR</b>	)	
	)	
<b>BRUCE M. MINES, DEBTOR,</b>	)	
<b>AND KENNETH E. WEST, TRUSTEE</b>	)	
	)	
<b>RESPONDENTS</b>	)	

**OBJECTION TO CONFIRMATION OF PLAN**

COMES NOW, U.S. Bank National Association, not in its individual capacity but solely as Trustee for the NRZ Pass-Through Trust XVIII, (“Secured Creditor”) by and through its undersigned attorneys, and for its Objection to Confirmation of Debtors Chapter 13 Plan, herein states and alleges as follows:

1. This Court has exclusive jurisdiction over this proceeding. Debtor filed this Petition under Chapter 7 of the United States Bankruptcy Code on or about March 19, 2024 and converted to a Chapter 13 on May 23, 2024 and confirmation is pending with the Court.
2. Secured Creditor holds a lien over Debtor’s property described as 1837 E. Pastorius Street, Philadelphia, PA 19138.
3. Debtor’s Plan proposes that the Property will be sold; however, the Plan does not provide for adequate protection payments nor what amendments to the plan will be made if the Property is not sold.

4. As of the date of filing this Objection to Confirmation, Secured Creditor's estimated secured claim is \$46,593.54 and the underlying loan matures on February 1, 2035. Secured Creditor will file its Proof of Claim by the bar date once it has been set, with the approximate arrears of \$40,338.74, which is above the arrearage of \$0.00 listed on Debtor's Plan.

5. Therefore, the plan fails 11 U.S.C. §1322 (b)(2)-(3), and pursuant to 11 U.S.C. §1325 (a)(5) the plan cannot be confirmed.

WHEREFORE, U.S. Bank National Association, not in its individual capacity but solely as Trustee for the NRZ Pass-Through Trust XVIII, prays that its Objection to Confirmation of Plan be sustained, and for all further relief as is just and proper.

Respectfully submitted,

/s/ Joshua I. Goldman  
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*Counsel for Creditor*

**CERTIFICATE OF SERVICE**

I hereby certify that on or before June 18, 2024, I caused a true and correct copy of the foregoing to be served either by CM/ECF notice to those so authorized, and first-class mail as indicated to the parties reflected below.

VIA U.S. MAIL

*DEBTOR*  
BRUCE M. MINES  
1837 E PASTORIUS ST  
PHILADELPHIA, PA 19138-1203

VIA ELECTRONIC MAIL

*ATTORNEYS FOR DEBTOR*  
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*TRUSTEE*  
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*U.S. TRUSTEE*  
UNITED STATES TRUSTEE  
OFFICE OF UNITED STATES TRUSTEE  
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Respectfully submitted,

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